

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DANIEL D'AMBLY

Plaintiff,

v.

CHRISTIAN EXOO a/k/a ANITFASH GORDON; ST.
LAWRENCE UNIVERSITY; TRIBUNE PUBLISHING
COMPANY; NEW YORK DAILY NEWS; VIJAYA
GADDE; TWITTER, INC., COHEN, WEISS AND SIMON,
LLP;

Defendants.

**ATTORNEY
DECLARATION**

Civil Action No.

2:20-cv-12880-JMV-JAD

I, ADAM P. MASTROLEO, ESQ. hereby certify and declare as follows:

1. I am a member of the law firm of Bond, Schoeneck & King, PLLC, attorneys for Defendant St. Lawrence University in the above captioned matter. As such, I am fully familiar with the facts and circumstances surrounding this litigation.
2. I submit this Declaration in support of the application of Defendant St. Lawrence University (the "University") for my admission *pro hac vice* pursuant to Local Civil Rule 101.1(c).
3. To date, the University has appeared for the purpose of filing a motion to dismiss the complaint filed by the Plaintiff.
4. Attached as **Exhibit A** is a true and correct table that identifies each bar in which I am a member in good standing, including the year of admission, and to the best of my knowledge, the name and address of the official office maintaining the role of such members in its bar.
5. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction. I understand my

continuing obligation to advise the Court of any disciplinary proceedings that may be instituted against me.

6. I am not eligible for plenary admission to the Bar of this Court under Local Civil Rule 101.1(b).

7. The issues raised in this litigation involve areas with which I have experience in the law.

8. Pursuant to the rules of this Court, all pleadings submitted on behalf of the University in this litigation will be signed by Monica C. Barrett, Esq., of Bond, Schoeneck & King, PLLC.

9. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial or other proceedings. I further agree to submit to the jurisdiction of this Court for the purposes of sanctions, discipline, or other such acts as the Court may deem proper.

10. Pursuant to Local Civil Rule 101.1(c)(2), I agree to pay the annual fee required by the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2.

11. Pursuant to Local Civil Rule 101.1(c)(3), I agree to make the required payment to Clerk, United States District Court.

12. For the foregoing reasons, I respectfully request on behalf of the University that I be admitted *pro hac vice* for the purpose of representing it in this matter in association with New Jersey counsel. I agree to be bound by the rules governing practice in the New Jersey Courts, including the disciplinary rules.

I certify and declare under penalty of perjury that the foregoing is true and correct.

Dated: November 11, 2020

s/ Adam P. Mastroleo
Adam P. Mastroleo, Esq.

EXHIBIT A

Bar	Year of Admission	Name and Address of the Official or Office Maintaining the Bar's Roll
United States District Court for the Northern District of New York	2007	US District Court Northern District of New York James M. Hanley Federal Building & U.S. Courthouse 100 S. Clinton St. Syracuse, NY 13261
United States District Court for the Eastern District of New York	2008	United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201
United States District Court for the Southern District of New York	2008	United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007 - 1312
United States District Court for the Western District of New York	2008	Clerk of Court, WDNY US District Court 100 State Street, Rm. 2120 Rochester, NY 14614
New York State Court	2007	New York State Unified Court System Office of Court Administration Attorney Registration Unit 25 Beaver Street - Room 840 New York, NY 10004